

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ALEJANDRO MANUEL ZAPATA OSORIO,  
ARTURO DEL RAZO, BRAULIO ROLANDO  
CASHABAMBA CHANGO, BYRON  
SALVADOR BARRERA SANCHEZ,  
CARLOS E. SIERRA RODRIGUEZ, EDWIN  
FABRICIO CASHABAMBA TUBON, JESUS  
SIERRA, JUAN SIERRA, RAMON  
ROSALES GALVEZ, RAUL CHAVEZ DIAZ,  
SEGUNDO LEANDRO ALULEMA GUANO,  
SEGUNDO NICOLAS SIGUENCIA  
ENCALADA, and WILDER RODRIGUEZ  
individually and on behalf of  
others similarly situated,

Plaintiffs,

- against -

Docket No.  
19-cv-04896-LDH-ST

VECTOR STRUCTURAL PRESERVATION  
CORP. (D/B/A VECTOR STRUCTURAL  
PRESERVATION), NORTH STAR  
STRATEGY, INC. (D/B/A NORTH STAR  
STRATEGY, INC.), BILL HANDAKAS,  
BILL HANDAKAS, VASSILIOS  
HANDAKAS, and SERGIO DOE

Defendants.

-----X

Held via Zoom videoconference

March 11, 2022  
2:00 p.m.

DEPOSITION of OMAR DELRAZO, Plaintiff,  
taken by Defendant, pursuant to Federal Rules of  
Civil Procedure, and Notice, held at the above-noted  
time and place, before Kyra Kustin, a Stenotype  
Reporter and Notary Public within and for the State  
of New York.

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A P P E A R A N C E S:

CSM LEGAL, P.C.

Attorneys for Plaintiffs

60 E. 42nd Street, Suite 4510

New York, New York 10165

BY: CLELA ERRINGTON, ESQ.

RABINOWITZ, GALINA & ROSEN

Attorneys for Defendants

94 Willis Avenue, Suite 2

Mineola, New York 11501

BY: DANIEL RABINOWITZ, ESQ.

A L S O P R E S E N T:

MARIA GUTIERREZ - Eiber Translations

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F E D E R A L   S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties herein, that the sealing, filing and certification of the within deposition be waived;

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to form, are reserved to the time of trial;

IT IS FURTHER STIPULATED AND AGREED that the transcript of this deposition may be signed before any Notary Public, with the same force and effect as if signed before a clerk or Judge of the Court;

IT IS FURTHER STIPULATED AND AGREED that all rights provided to all parties by the F.R.C.P. cannot be deemed waived, and the appropriate sections of the F.R.C.P. shall be controlling with respect thereto.

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1 OMAR DELRAZO

2 M A R I A G U T I E R R E Z,

3 The Spanish Interpreter herein, was  
4 duly sworn to interpret the questions from  
5 English into Spanish and the answers from Spanish  
6 into English, to the best of her ability:

7 O M A R D E L R A Z O,

8 Plaintiff, having first been duly sworn  
9 through the Interpreter, was examined and  
10 testified as follows:

11 THE REPORTER: State your name for  
12 the record.

13 THE WITNESS: Omar Delrazo.

14 THE REPORTER: State your address  
15 for the record.

16 THE WITNESS: 150 37th, Union  
17 City, New Jersey, 07087.

18 THE REPORTER: The attorneys  
19 participating in this deposition  
20 acknowledge that I am not physically  
21 present in the deposition room, and  
22 that I will be reporting this  
23 deposition remotely. They further  
24 acknowledge that, in lieu of an oath  
25 administered in person, I have

1 OMAR DELRAZO

2 administered the oath remotely.

3 The parties and their counsel  
4 consent to this arrangement and waive  
5 any objections to this manner of  
6 reporting. Please indicate your  
7 agreement by stating your name and your  
8 agreement on the record.

9 MR. RABINOWITZ: Daniel  
10 Rabinowitz, I agree.

11 MS. ERRINGTON: Clela Errington,  
12 and I agree.

13 EXAMINATION

14 BY MR. RABINOWITZ:

15 Q Good afternoon, Mr. Delrazo. My name  
16 is Dan Rabinowitz. I am an attorney for  
17 defendants in this matter, and before we get  
18 started, I just want to go over a few ground  
19 rules.

20 A Yes. That's fine.

21 Q First, as you see, we have an  
22 interpreter here today. So even if you  
23 understand some English, please let me finish  
24 asking my questions, and the interpreter will  
25 interpret the question. And after you hear the

1 OMAR DELRAZO

2 question from the interpreter, you can respond.

3 Okay?

4 A Okay. That's fine.

5 Q Okay. Just so we have a clear record,  
6 only one person speaks at a time, and when you're  
7 answering questions, please say yes or no or some  
8 other verbal response. Do not nod your head or  
9 anything like that in response to my questions.

10 Okay?

11 A Okay. That's fine.

12 Q And I don't think we'll be here for so  
13 long today, but if you need a break at any point,  
14 let me know, and we can take one. The only thing  
15 that I ask is that if I've just asked a question,  
16 please give a response to that question, and we  
17 can take a break after that.

18 A Yes. That's fine.

19 Q Okay. So first, are you under the  
20 influence of any alcohol, drugs, or other  
21 medication today that could influence your  
22 testimony?

23 A No.

24 Q Okay. Have you failed to take any  
25 medication today that you normally take that

1 OMAR DELRAZO

2 could affect your ability to understand and  
3 answer my questions?

4 A No.

5 Q Okay. Great. Have you ever -- today  
6 we're here for a deposition. Have you ever been  
7 deposed before?

8 A No.

9 Q Okay. What is your birthday?

10 MR. RABINOWITZ: We'll only put  
11 the year on the record.

12 A XX/XX of '83.

13 Q Okay. Where were you born?

14 A In Mexico.

15 Q Okay. How long have you lived in the  
16 United States for?

17 A For about 17 years, more or less.  
18 Since about 2004.

19 Q Okay. Are you a U.S. citizen?

20 A No.

21 Q Okay. So that means you don't have a  
22 social security number?

23 A No. I don't have one.

24 Q Okay. Are you currently employed?

25 A Yes.



1 OMAR DELRAZO

2 Q Okay. Who is your current employer?

3 A His name is Rudolpho, he's the foreman.  
4 I don't recall -- he's a contractor, but I don't  
5 recall the name of the owner of the company.

6 Q Okay. Do you know the name of the  
7 company itself?

8 A I've been at that company for a short  
9 amount of time, so I do not recall the name of  
10 that company.

11 Q Okay. I just want to leave a space in  
12 the record, then, to provide that name later.

13 A Yes. That's fine.

14 (REQUESTED INFORMATION:

15 \_\_\_\_\_  
16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_  
20 \_\_\_\_\_ )

21 Q What kind of work do you do for this  
22 company?

23 A Laying brick.

24 Q And how long have you worked there for?

25 A I've been at this company only for 20

1 OMAR DELRAZO

2 days or one month. It's new.

3 Q Is it fair to say you started working  
4 there in February of 2022?

5 A Yes. More or less.

6 Q And where did you work before that?

7 A Jem Construction.

8 Q How do you spell that? Is that G-e-m?  
9 Do you know?

10 A Uh-huh.

11 Q So is it J-e-m?

12 A Yes.

13 Q Okay. And when did you -- how long did  
14 you work there for?

15 A One year.

16 Q Okay. And what kind of work did you do  
17 there?

18 A Block. Putting down blocks or laying  
19 bricks. Same.

20 Q Okay. And where did you work before  
21 that?

22 A HDK.

23 Q Okay. Did you also lay bricks there?

24 A Yes. Also.

25 Q Okay. And do you remember when you

1 OMAR DELRAZO

2 started working there?

3 A At Jem?

4 Q Yes.

5 A I believe I started there at the  
6 beginning of 2020.

7 Q Okay. What about HDK? Do you know  
8 when you started working there?

9 A Like, in -- well, perhaps between 2019  
10 and 2020. So 2019 to 2020.

11 Q Okay. And where did you work before  
12 that?

13 A I don't recall, being that I've worked  
14 at a few companies.

15 Q Okay. So you don't remember anywhere  
16 you worked before HDK.

17 A The name of the company is called  
18 Central. Central.

19 Q Okay. Were you also a bricklayer  
20 there?

21 A Yes. Also.

22 Q Okay. Do you know why we're here  
23 today?

24 A Yes.

25 Q Okay. Do you know the company you

1 OMAR DELRAZO

2 worked for that is the reason that we're here  
3 today?

4 A Vector Construction.

5 Q Okay. When did you start working for  
6 Vector?

7 A I worked there for about two seasons  
8 between September to December. Then I went back  
9 in May, and then I left in June.

10 Q Okay. In what years did you work there  
11 September through December?

12 A 2018.

13 Q Okay. And you went back there, was it  
14 May to June 2019?

15 A Uh-huh. Yes.

16 Q Okay. And how did you get your job  
17 with Vector?

18 A Through a friend that worked there.

19 Q Okay. What was this friend's name?

20 A Ramon Rosales.

21 Q Can you spell that please, the last  
22 name.

23 A R-o-s-a-l-e-s.

24 Q Thank you. How did you know this  
25 person?

1 OMAR DELRAZO

2 A At construction jobs.

3 Q Do you remember when you met him?

4 A 2010.

5 Q Okay. And how did he -- how did he  
6 tell you about the job?

7 A He asked me if I needed work because  
8 they were looking for people to work over there  
9 at Vector Construction.

10 Q Okay. And where did you live when you  
11 were working for Vector construction?

12 A In Queens.

13 Q Okay. Do you still live in Queens?

14 A No.

15 Q All right. I guess, where do you live  
16 now?

17 A 150 37th Street.

18 Q Okay. And what was your address when  
19 you were working for Vector Construction?

20 A 9809 34th.

21 Q That's in Queens?

22 A Yeah. Corona, Queens.

23 Q Thank you. So after you got the job,  
24 how long was it before you started working?

25 A What do you mean? I don't understand

1 OMAR DELRAZO

2 the question.

3 Q So after Ramon told you about the job  
4 at Vector, when did you start working there?

5 A You mean when I left Vector and started  
6 again? Or...

7 Q No. When you first started working for  
8 Vector, how long was it between when you were  
9 told of the job and when you started working at  
10 Vector?

11 A After I found out about Vector?

12 Q Yes.

13 A About a month.

14 INTERPRETER: Hold on.

15 A About a month later. That's when I  
16 started working again.

17 Q So I'm talking about the first time you  
18 started working for Vector.

19 A The first time was September to  
20 December.

21 Q Okay. And when did Ramon tell you  
22 about the job?

23 A The first time was in September.

24 Q Okay. Where did you work when you  
25 worked for Vector? What was your job site?

1 OMAR DELRAZO

2 A In Yonkers.

3 Q Do you remember the specific address?

4 A No. I don't recall.

5 Q And how did you get to the job every  
6 day?

7 A By train, and then by bus.

8 Q Okay. Did you travel with anyone?

9 A No.

10 Q Okay. Did you work at any other sites  
11 for Vector besides the Yonkers site?

12 A No.

13 Q All right. So you worked at the  
14 Yonkers site from September to December 2018, and  
15 May and June 2019?

16 A Yes.

17 Q Okay. And what tools did you use when  
18 you worked for Vector?

19 A I used the leveler, the hammer, the  
20 measurer, the line, the harness, the belt, the  
21 ladder to get up to the scaffold, the helmet and  
22 all of that.

23 Q Okay. And did you provide your own  
24 tools? Or did Vector provide them to you?

25 A No. We would buy everything ourselves.

1 OMAR DELRAZO

2 Q Okay. So when you worked at the  
3 Yonkers construction project, what were your  
4 hours?

5 A Excuse me? What was what?

6 Q All right. When you worked at the  
7 Yonkers site, what hour did you start in the  
8 morning?

9 A From 7 in the morning to 6:30 in the  
10 evening.

11 Q Okay. Did you have any lunch breaks?

12 A So in the morning for the coffee break,  
13 it would be about a 15-minute break at 10 a.m.,  
14 and then at 12 we would take about 30 minutes to  
15 eat our food.

16 Q Okay. And did you take those breaks  
17 every day?

18 A Yes.

19 Q Okay. Were those the only breaks you  
20 took every day?

21 A Yes.

22 Q And what days of the week did you work?

23 A Monday through Friday, and sometimes  
24 Saturdays, as well.

25 Q How often would you work on Saturdays?



1 OMAR DELRAZO

2 Like, how many Saturdays per month would you  
3 work?

4 A Two to three, and then I wouldn't go.

5 Q Okay. So you're saying you worked two  
6 to three Saturdays every month?

7 A Two Saturdays because I wouldn't go  
8 every Saturday.

9 Q Okay. And did you ever work on Sunday?

10 A No.

11 Q Okay. Did you work if it was raining  
12 out?

13 A No. No.

14 Q What about if it snowed? Would you  
15 have worked?

16 A No.

17 Q Okay. Did you ever work on holidays?  
18 Like, let's say, Christmas?

19 A No.

20 Q Okay. And how many hours would you  
21 work on Saturdays when you worked on Saturdays?

22 A From 8 to 3:30.

23 Q Okay. And how many weeks did you work  
24 at the Yonkers project for?

25 A Weeks? Or months?

1 OMAR DELRAZO

2 Q Let's do months.

3 A Three months.

4 Q Okay.

5 A And the second time, three months.

6 Q So you worked at the Yonkers project  
7 from September to December 2018 and May to June  
8 of 2019?

9 A Yes.

10 Q Okay. Were you paid when you worked  
11 for Vector?

12 A At the beginning, the first time that I  
13 went there, yes. But the second time when I came  
14 back at that point, no.

15 Q So you were paid in September through  
16 December 2018 and not paid in May through June  
17 2019.

18 A Exactly.

19 Q Okay. And what were you told your pay  
20 was going to be for September through December  
21 2018?

22 A What was that? I didn't hear the  
23 question very well.

24 Q How much money were you told you were  
25 going to be paid from September through December

1 OMAR DELRAZO

2 2018?

3 A They would pay me \$35 per hour.

4 Q And you were paid that for all hours  
5 that you worked from September through December  
6 2018?

7 A Yes.

8 Q Okay. And for May through June 2019,  
9 what were you told your pay was supposed to be?

10 A The same.

11 Q Okay. And who told you that your pay  
12 was going to be \$35 per hour?

13 A Sergio, the foreman.

14 Q Okay. Was Sergio your boss for the  
15 project?

16 A Well, the one that was in charge. Yes.

17 Q Okay. Was anyone in charge of Sergio?

18 A Bill, the owner of the company. He's  
19 the only one that directly had contact with  
20 Sergio.

21 Q You said Bill?

22 A Yes.

23 Q Okay. Did you ever meet Bill?

24 A No. He never went -- everything -- all  
25 the basis of everything that we did was through

1 OMAR DELRAZO

2 Sergio.

3 Q Then how did you know Bill was Sergio's  
4 boss?

5 A Because Sergio would tell us.

6 Q Okay. And when you were paid in  
7 September through December 2018, how often were  
8 you paid? Were you paid weekly? Biweekly?  
9 Something else?

10 A Weekly.

11 Q Weekly. Okay. Were you paid by cash  
12 or check?

13 A Cash.

14 Q Okay. Were you ever paid by check?

15 A Yes. When they would do that, it would  
16 be via personal check.

17 Q And was there a company name on that  
18 check?

19 A I don't recall. It's been over two  
20 years, so I don't recall very well.

21 Q Okay. Do you remember if there was a  
22 personal name on that check? Maybe Sergio's  
23 name? Or Bill's name? Or something like that?

24 A No. I don't recall.

25 Q Okay. And you were never paid for May

1 OMAR DELRAZO

2 through June 2019; correct?

3 A They would pay us, but not the amount  
4 that they were supposed to pay us. They would  
5 be, like, we'll pay the other part of it the  
6 following week, and then they would start  
7 accumulating and then they never paid us for the  
8 amount that we were owed.

9 Q Okay. So how much were you supposed to  
10 be paid from May through June 2019?

11 A For the five days during the week,  
12 eight hours a day, would be 1500.

13 Q Okay. And did they ever tell you what  
14 you were supposed to be paid on weekends?

15 INTERPRETER: Hold on one second.  
16 I think he said 1400. Can I verify  
17 that with him? I just want to make  
18 sure.

19 MR. RABINOWITZ: Yes, please.

20 INTERPRETER: Because I think I  
21 said the wrong thing. So it was 1400.  
22 My apologies.

23 MR. RABINOWITZ: Not a problem.

24 Q Who told you that you were supposed to  
25 be paid \$1400 a week?

1 OMAR DELRAZO

2 A Sergio.

3 Q Okay. And do you remember what days or  
4 weeks you weren't paid for in May through June  
5 2019?

6 A It would be every week, they wouldn't  
7 pay us completely.

8 Q Okay. Do you remember how much less  
9 than you were told to be paid you were actually  
10 paid?

11 INTERPRETER: One second.

12 A So it would be anywhere between  
13 \$800-900, and then they'd always say we'll pay  
14 the rest of it the following week -- the next  
15 week. So they kept saying that, so we got tired  
16 of it. We decided it was best that we leave,  
17 start a lawsuit because it's a heavy type of job.  
18 You're risking your life, and you're not getting  
19 paid.

20 Q Okay. And do you remember how you were  
21 paid for May through June 2019? Was it cash? Or  
22 check?

23 A So sometimes they would pay us in cash,  
24 but when they would pay us in check, there would  
25 be no funds, so it would bounce. And they

1 OMAR DELRAZO

2 already knew us at the cashier -- the  
3 check-cashing place. They wouldn't accept for  
4 the checks to be changed because they already  
5 knew about that company.

6 Q Did those checks have a company name on  
7 them?

8 A I really didn't take a look at that or  
9 pay attention to that. I really don't recall.

10 Q Do you remember who signed the checks?

11 A No.

12 Q Do you have any of the checks in your  
13 possession?

14 A I gave them to my lawyer here at the  
15 lawyer's office, Michael Fallisha [phonetic].  
16 But I just gave him two that they wouldn't  
17 exchange for me.

18 MR. RABINOWITZ: Okay. Just to  
19 the extent they haven't been produced  
20 yet, we're going to call for production  
21 of those checks.

22 MS. ERRINGTON: They have --  
23 (Technical disruption.)

24 MR. RABINOWITZ: They have been  
25 produced, you said? I'm sorry. I

1 OMAR DELRAZO

2 can't hear you very well.

3 MS. ERRINGTON: Yes. These have  
4 been produced, I believe, twice.

5 MR. RABINOWITZ: Okay. Great.  
6 Thank you.

7 Q All right. So when you got to the job  
8 every day, where you would you report to?

9 A With Sergio -- to the sign-in sheet  
10 with Sergio.

11 Q Okay. Where was that?

12 A In the basement.

13 Q The basement of what?

14 A Of the Vector job in Yonkers.

15 Q Okay. Was that the basement of a  
16 building? Or the basement of a trailer?  
17 Something like that?

18 A The basement of the building that we  
19 were building.

20 Q And Sergio was there every day when you  
21 signed in?

22 A Yes.

23 Q Okay. Was anyone else there when you  
24 would sign in every day?

25 A What was that? I didn't understand.



1 OMAR DELRAZO

2 Q Was there anyone else in the basement  
3 when you would sign in every day, besides Sergio?

4 A Well, all of my coworkers.

5 Q Okay. And did you sign out every day  
6 when you left?

7 A No. Sergio would be the one in charge  
8 of signing out at the end of the day.

9 Q Okay. So would you tell him when you  
10 were leaving, and he would sign you out in the  
11 book every day?

12 A No. Because all of us already knew our  
13 time to leave for the end day was 6:30. So he  
14 would just sign for it.

15 Q And when you would get paid, what  
16 physical location were you paid at?

17 A Right there at the -- in the basement.

18 Q Okay. So -- and how did that happen?  
19 Did Sergio just directly hand you a check or the  
20 cash?

21 A Yes. He'd give us -- hand us the  
22 check. And then he said the other amount, you'll  
23 get next week, and Bill will be the ones to give  
24 it to you.

25 Q Okay. And so you're saying he said

1 OMAR DELRAZO

2 Bill -- I'm sorry. Withdrawn.

3 What work did you do for Vector?

4 A I would lay brick in suspended  
5 scaffolds.

6 Q Did you do any other work for Vector?

7 A No. Just laying brick.

8 Q Okay. And who did you work with at the  
9 Yonkers job?

10 A They'd always change the different  
11 coworkers, but it was right there within the same  
12 place.

13 Q Do you remember the names of these  
14 coworkers?

15 INTERPRETER: He said -- the first  
16 name. I couldn't hear them, but I'll  
17 get that from him in a second. He  
18 said:

19 A Juan, Ramon, Carlos, and Miner  
20 [phonetic]. And there was a lot of other  
21 coworkers there.

22 INTERPRETER: Can I get the first  
23 name? I didn't hear him clearly.

24 MR. RABINOWITZ: Yes.

25 A Lucio.

1 OMAR DELRAZO

2 INTERPRETER: So Lucio.

3 Q Okay. And did Sergio direct your work  
4 every day?

5 A Yes.

6 Q Did anyone else ever tell you what to  
7 do at the Yonkers job?

8 A No. Sergio would be the only one to  
9 tell us you're going to work on that specific  
10 scaffold, on that specific wall.

11 Q Did you ever supervise anyone at the  
12 Yonkers job?

13 A No. No. No. No. I was only a  
14 worker.

15 Q Did anyone ever come to you for any  
16 reason for direction for the Yonkers job?

17 A No.

18 Q All right. Did you ever keep a log of  
19 your hours that you worked for Vector?

20 A No. Sergio was in charge of that.

21 Q So you didn't have a diary of hours or  
22 a calendar of hours?

23 A No. Because we would sign in and then  
24 Sergio would be in charge of the hours.

25 Q All right. And did you ever keep a log

1 OMAR DELRAZO

2 of how much you were paid for -- when you were  
3 working for Vector?

4 A No. We would sign in the entrance,  
5 then they would write it down. And, if anything,  
6 I would tell Sergio -- he'll be, like, you'll get  
7 this amount, and -- but it would be less than the  
8 amount we were supposed to get. And this  
9 happened every eight days. So we all figured it  
10 was better to leave and find a lawyer because  
11 they'd tell us the same thing every eight days,  
12 and it wasn't fair.

13 Q Did you ever go to Vector's  
14 headquarters?

15 A Not me. No.

16 Q Did you ever see any corporate  
17 documents from Vector, such as their bylaws or  
18 articles of incorporation?

19 INTERPRETER: Did you say bylaws  
20 or incorporation? I couldn't hear you  
21 clearly.

22 MR. RABINOWITZ: Bylaws or  
23 articles of incorporation.

24 INTERPRETER: Bylaws and articles  
25 of incorporation?

1 OMAR DELRAZO

2 MR. RABINOWITZ: Yeah.

3 INTERPRETER: Okay. Sorry. I  
4 just want to make sure I got that.

5 A No. Never.

6 Q Do you know where Vector's headquarters  
7 was?

8 A No. I did not know.

9 Q Okay. And do you know anyone who  
10 worked in Vector's headquarters?

11 A No.

12 Q Okay. I'm going to ask if you know a  
13 series of names. So for each name, first let me  
14 know if you know them. And if you do know any of  
15 these people, I'm going to ask further questions.  
16 Okay?

17 A That's fine.

18 Q Okay. Do you know Alejandro Manuel  
19 Zapata Osorio?

20 A I don't recall everyone's name.

21 Q What about Braulio Rolando Cashabamba  
22 Chango?

23 A Yeah. Braulio. Yeah.

24 Q How do you know him?

25 A Who? Braulio?

1 OMAR DELRAZO

2 Q Yes.

3 A He worked there.

4 Q Did you know him before you started to  
5 work for Vector?

6 A No. I got to know them all at work.

7 Q Did you work directly with Braulio?

8 A No.

9 Q Okay. So you were not part of the same  
10 team.

11 A No. We'd always work with Sergio.  
12 We'd get directions from Sergio.

13 Q All right. So did you ever work as  
14 part of a team at Vector? Or you did everything  
15 individually?

16 A Uh-huh.

17 Q Okay. Did you ever go to or from the  
18 job site with anyone? Or did you go to Yonkers  
19 by yourself every day?

20 A No. I'd go and I'd come back alone.

21 Q Okay. Do you know Byron Salvador  
22 Barrera Sanchez?

23 A Like I told you before, I don't recall  
24 everyone's name.

25 Q Okay. What about Carlos Sierra

1 OMAR DELRAZO

2 Rodriguez?

3 A I do know Carlos, his brother, and his  
4 father very well.

5 Q How do you know them?

6 A From many years ago working in  
7 construction.

8 Q Okay. So you kept in touch with him  
9 over many years, and you got to know his family.  
10 Is that fair to say?

11 A Not his entire family, but I would get  
12 along very well with Carlos, Juan, and his  
13 father.

14 Q So you would see them the outside of  
15 work?

16 A Sometimes.

17 Q Okay. What about Edwin Fabricio  
18 Cashabamba Tubon?

19 A I don't recall very well the names of  
20 the rest.

21 Q What about Jesus Sierra?

22 A That's Juan and Carlos's father. Yes.

23 Q Okay. So that means you know Juan  
24 Sierra, right?

25 A Yes.

1 OMAR DELRAZO

2 Q Okay. What about Ramon Rosales Galvez?

3 A He's the one that recommended that job  
4 to me.

5 Q And how long did you know him for  
6 before you started working at Vector?

7 A About eight years.

8 Q And what about Raul Chavez Diaz?

9 A Yes. I also know that man.

10 Q Did you meet him at the Yonkers job?  
11 Or did you meet him before that?

12 A No. At the Yonkers job.

13 Q Okay. What about Segundo Leandro  
14 Alulema Guano?

15 A I did know him at work. Same.

16 Q And did you know him before you started  
17 working for Vector?

18 A No.

19 Q Okay. What about Segundo Nicolas  
20 Siguencia Encalada?

21 A Same thing. At the job.

22 Q Okay.

23 A But I did not know them beforehand.

24 Q And what about Wilder Rodriguez?

25 A Same thing. There at the job.



1 OMAR DELRAZO

2 Q Okay. Before you started working for  
3 Vector, did you have to fill out any forms?

4 A No. I didn't have to fill anything  
5 out.

6 Q Okay. So you didn't fill out an  
7 I-9 form?

8 A They never asked you for anything  
9 there. They didn't care. They didn't ask you  
10 for licenses of any kind or for you to, you know,  
11 give them anything like that. There were people  
12 that didn't have the scaffolding suspension  
13 credits that they needed by law. They would  
14 never even ask those people for that.

15 Q Okay. And did you receive any form  
16 from Vector such as a wage form? A W-2 form?

17 A No. Nothing.

18 Q Okay. Do you know an Angel Cuihado  
19 [phonetic].

20 A No.

21 Q What about David Cuevas.

22 A Perhaps they're coworkers, but I don't  
23 recall them.

24 Q All right. So right now you have no  
25 recollection of him -- of working with him.

1 OMAR DELRAZO

2 A Perhaps, yes, but there's a lot of  
3 times that you know the people that you work with  
4 by nicknames, so...

5 Q So you're not sure. You might know  
6 him, and you might not know him.

7 A Exactly.

8 Q What about John Palmer?

9 A Same. No.

10 Q Okay. What about Jose Viesnef  
11 [phonetic]?

12 A No. No. I don't recall him.

13 Q And what about Jose Abato?

14 A No.

15 Q Okay. And you did know Bill Handakas,  
16 right?

17 A No.

18 Q Okay. And when did you first report  
19 that you were not being paid all the wages that  
20 you were supposed to be paid?

21 INTERPRETER: I'm just going to  
22 repeat the question.

23 A Well, I sold Sergio -- we all got  
24 together and told Sergio we're not going to work  
25 here anymore. We're all going to leave because

1 OMAR DELRAZO

2 it's not fair. You're not paying us the right  
3 amount. So one week they'd tell us you'll get  
4 paid the next week, the rest of it, but every  
5 week we'd have to stop because they weren't  
6 paying us the money.

7 Q Okay. When did you first talk to  
8 Sergio about this?

9 A It wasn't just me. It was all of us  
10 that said something to him, but I no longer  
11 recall because so many years have already passed.

12 Q Okay. And what happened when you  
13 talked to Sergio? What did he do?

14 A Sergio would tell us just keep working.  
15 Don't worry about it. Bill's going to pay you  
16 next week. Just keep working. But the same  
17 thing would happen every single week, and they  
18 wouldn't pay us.

19 MR. RABINOWITZ: All right. Can  
20 we take a ten-minute break? I want to  
21 check my notes to see if we have  
22 anything further we need to talk about.

23 A Okay. That's fine.

24 (A recess was taken at 2:48 p.m.)

25 Q I just have a few more questions, and

1 OMAR DELRAZO

2 then we'll be done for today.

3 A Yes. That's fine.

4 Q Have you ever been -- have you ever  
5 went by any other name other than Arturo Delrazo?

6 A Omar.

7 Q So would that be Omar Delrazo?

8 A My full name is Omar Delrazo, but the  
9 majority of the people know me as Arturo Delrazo.

10 Q Okay. And when you signed in at Vector  
11 every day, what name did you put on the sign-in  
12 sheet?

13 A I don't recall if I would write down  
14 Omar or Arturo.

15 Q So it could have been either one?

16 A Yes.

17 Q Okay. And when the checks were -- when  
18 you got checks, what name was on them? Arturo?  
19 Or Omar?

20 A I don't recall.

21 Q Have you ever heard of a company called  
22 North Star Strategy, Inc.?

23 A No.

24 Q So you never worked for North Star  
25 Strategy, Inc.?

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OMAR DELRAZO

A No.

MR. RABINOWITZ: One second. All  
right. That's all I have for today.  
(TIME NOTED: 3:02 p.m.)

---

OMAR DELRAZO

Subscribed and sworn to  
Before me this \_\_\_\_\_ day  
Of \_\_\_\_\_, 2022.

---

NOTARY PUBLIC

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5 REQUESTS

6 DESCRIPTION	PAGE
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7

Request for copy of checks. 22

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1 OMAR DELRAZO  
2 CERTIFICATION

3 STATE OF NEW YORK )  
4 ) SS

5 COUNTY OF SUFFOLK

6 I, KYRA KUSTIN, a stenotype reporter  
7 and Notary Public within and for the State of New  
8 York, do hereby certify;

9 That the witness whose Examination  
10 Before Trial is hereinbefore set forth was duly  
11 sworn by me;

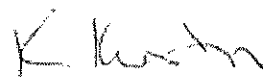
12 That such Examination Before Trial is a  
13 true and accurate record of the testimony given  
14 by said witness.

15 I further certify that I am not related  
16 to any of the parties to this action by blood or  
17 marriage, and that I am in no way interested in  
18 the outcome of this matter.

19 IN WITNESS WHEREOF, I have hereunto set  
20 my hand this 25th day of March, 2022.

21

22



KYRA KUSTIN



23

24

25

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